

Amendments to the Drawings:

Figures 1 and 7 have been changed to include the legend “Prior Art”. The attached sheets which include Figures 1 and 7 replace the original sheets including Figures 1 and 7.

REMARKS

Claims 1-25 remain in the application. Independent claims 1 and 23 have been amended to include the limitations of at least one lower and one upper rear reflective electrodes. Dependent claims 4, 6, 9, 10, 16, 17, 19, and 21 have been amended to reflect the included limitations of claims 1 and 23. Support for these amendments can be found in the paragraph 53 of the current application. Claim 2 has been amended to overcome the section 112 objection. No new matter has been included with these amendments.

A. Drawings

Figures 1 and 7 has been objected to for not including a legend designating Figures 1 and 7 as Prior Art. Figures 1 and 7 have been amended to include the legend "Prior Art", as evidenced in the replacement drawing enclosed, in order to overcome the rejection. These drawings are provided for the Examiner's approval. Thus, reconsideration and withdrawal of the objection to the drawing are respectfully requested.

B. 35 U.S.C. § 112

Claim 2 stands rejected under 35 U.S.C 112, second paragraph, as being indefinite. Claim 2 has been amended for clarity. Thus, reconsideration and withdrawal of the Section 112 rejection of claim 2 is respectfully requested.

C. 35 U.S.C. § 102(e)

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention

must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Sandstrom- Claims 1-3 and 23-25

Claims 1-3 and 23-25 stand rejected under 35 U.S.C. § 102(e) as being anticipated by the U.S. Patent No. 6,285,488 issued September 23, 2003 to Sandstrom, et al. (hereinafter “Sandstrom”) (Office Action, page 3). With regard to independent claims 1 and 23, claims 1 and 23 have been amended to include the limitations of at least one lower and upper rear reflective electrode. The support for these amendment can be found in the Detailed Description section of the current application at, for example, page 15, paragraph 53.

The Office relies on Sandstrom for a teaching of a lithography system comprising all of the basic features of the instant claims (Office action, page 3). However, Sandstrom does not disclose or even suggest the limitation of a reflective liquid crystal display comprising at least one lower reflective rear electrode and at least one upper reflective rear electrode, as recited in the amended claims 1 and 23. Therefore, since Sandstrom does not teach or suggest all of the limitations of independent claims 1 and 23, and since dependent claims 2-3 and 24-25 depend from claims 1 and 23 respectively, it is respectfully submitted that claims 1-3 and 23-25 are not anticipated by Sandstrom. Because the dependent claims are allowable for at least the reason of depending from allowable base claims, Applicants are not addressing further the rejections of the dependent claims at this time. Thus, reconsideration and withdrawal of the Section 102(e) rejection of claims 1-3 and 23-25 are respectfully requested.

D. 35 U.S.C. § 103(a)

M.P.E.P. 706.02(j) sets forth the standard for a Section 103(a) rejection:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Sandstrom in view of Mori- Claims 4-22


Claims 4-22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sandstrom in view of the U.S. patent No. 5,359,441 issued to Mori et. al. (hereinafter "Mori")(Office Action, page 4). The Office contends that it would have been obvious to employ the display system of Mori into the system of Sandstrom to generate pixel patterns that can be projected onto the substrate. (Office Action at page 4-5). However, "to establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art." *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). With respect to claims 4-22, these claims depend from claim 1 which contains the limitation that the reflective liquid crystal display comprises at least one lower reflective rear electrode and at least one upper reflective rear electrode. Neither Sandstrom alone or in combination with Mori teach or suggest the limitations of the display comprising at least one lower reflective rear electrode and at least one upper reflective rear electrode. Therefore, the examiner has failed to establish a prima facie

case of obviousness here. Thus, reconsideration and withdrawal of the Section 103(a) rejection of claims 4-22 is respectfully requested.

In view of the foregoing remarks, the Applicants request allowance of the application. Please forward further communications to the address of record. If the Examiner needs to contact the below-signed agent to further the prosecution of the application, the contact number is (503) 264-0944.

Respectfully submitted,

Dated: September 13, 2004


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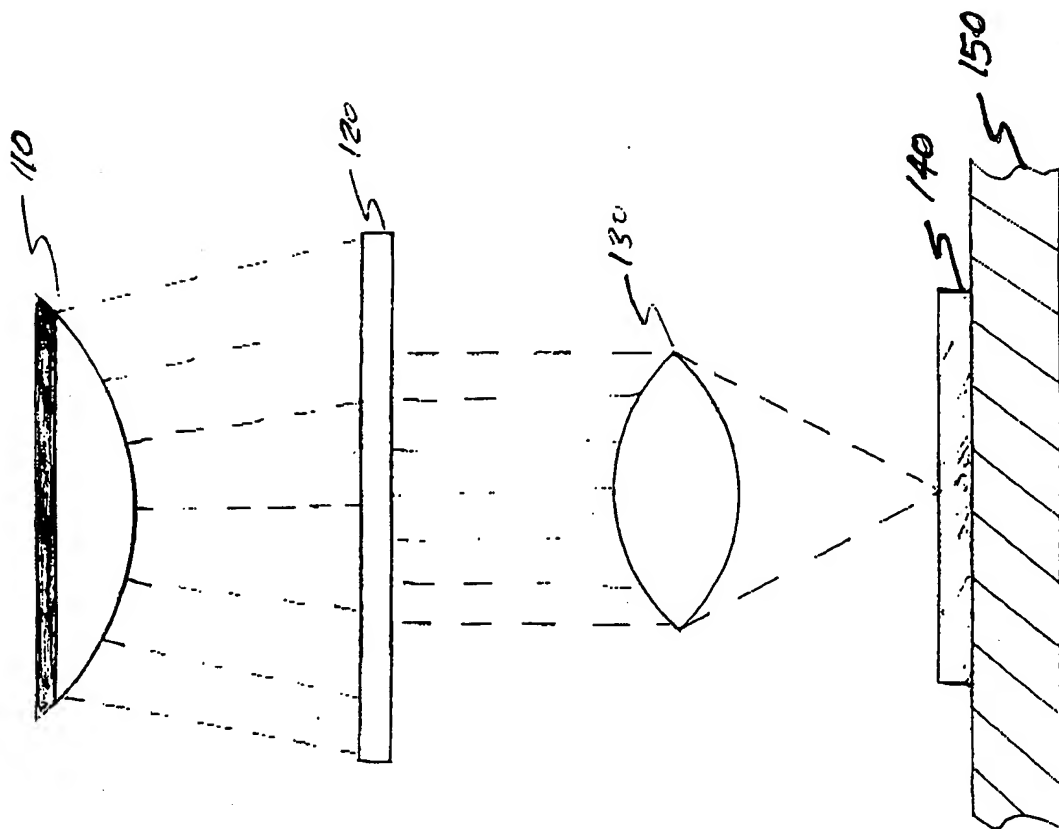


FIG. 1
(PRIOR ART)



Blakely, Sokoloff, Taylor & Zafman LLP (503) 439-8778
Title: REFLECTIVE LIQUID CRYSTAL DISPLAY LITHOGRAPHY
SYSTEM

<Annotated Marked-Up Drawings>

1st Named Inventor: Michael Kozhukh

Application No.: 10/057,706

Sheet: 2 of 2

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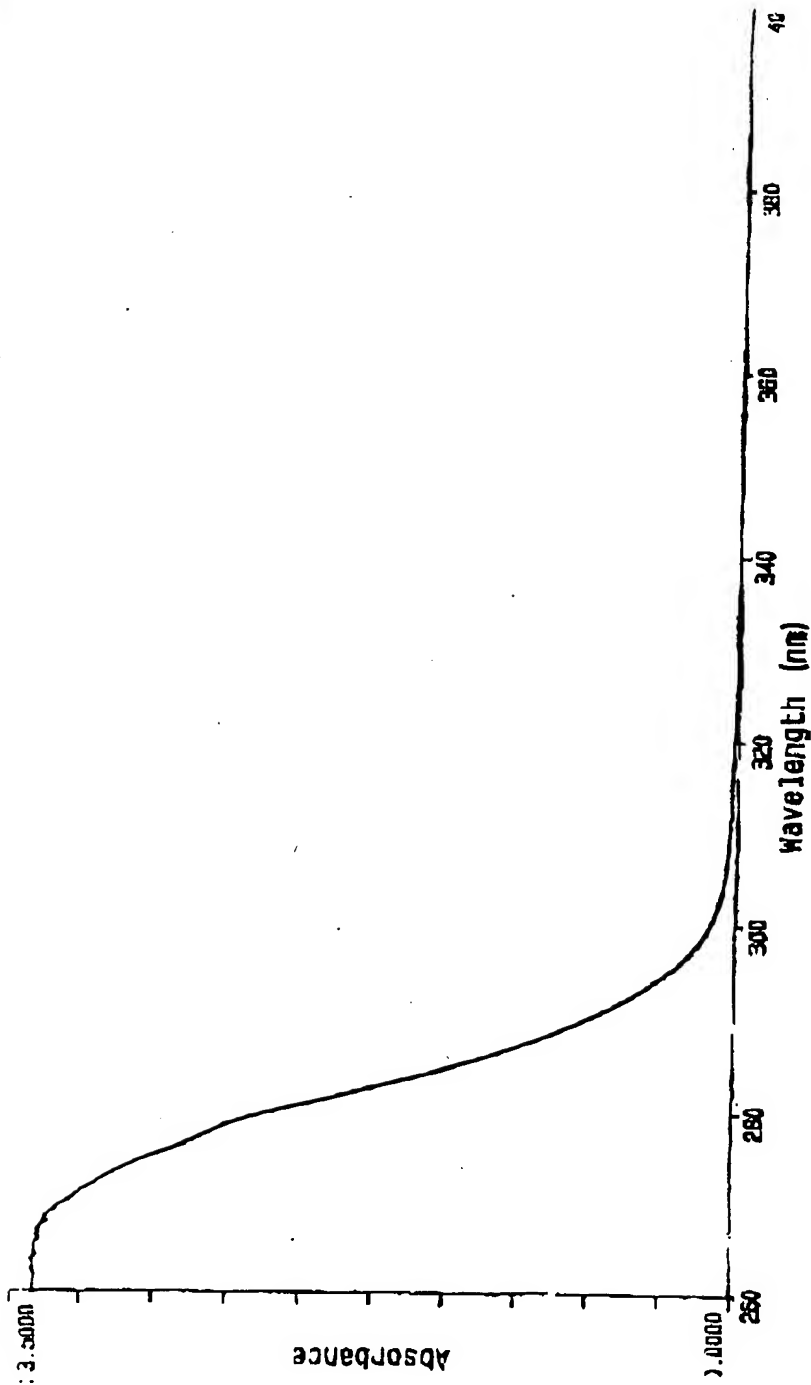


FIG. 7
(PRIOR ART)